

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

SECURITIES AND EXCHANGE
COMMISSION,

Case No. 07 CIV 9606

Plaintiff,

vs.

OLEKSANDR DOROZHKO,

DECLARATION OF MICHAEL FOX

Defendant.

DECLARATION OF MICHAEL FOX

I, MICHAEL FOX, declare as follows:

1. I am the Director of Employee and Executive Communications at IMS Health Incorporated ("IMS" or "the Company"), which has its principal place of business in Norwalk, Connecticut. I submit this declaration to describe the events leading to the publication on October 17, 2007 of IMS's announcement of its third quarter ("3Q") earnings for fiscal year 2007. I make this declaration based on my personal knowledge of the events described below.

2. I have worked at IMS at positions of increasing responsibilities for ten years. I have served as the Director of Employee and Executive Communications for the last three years.

3. As Director of Employee and Executive Communications, my job responsibilities include the communication of IMS's financial results to investors and the public. I am responsible for, among other things, the communication of IMS's releases

of its quarterly earnings to investors and the public, including through the posting of such releases on IMS's global intranet, the newswire services through Business Wire, and www.imshealth.com.

The October 17, 2007 Earnings Release

4. Beginning on or about October 1, 2007, IMS began preparing for its conference call with investors, scheduled for October 17, 2007, to announce the Company's 3Q earnings. This activity included the drafting and editing of the relevant portions of the earnings call script and the drafting of IMS's 3Q earnings press release.

5. On October 17, 2007, I directed the communication of IMS's 3Q earnings release to investors and the public, which occurred at 4:33 p.m. after the close of the stock market on October 17. Prior to publishing IMS's 3Q earnings release, the Company, its employees and its agents took steps to maintain the confidence of the information contained in this release.

6. IMS uses the Business Wire service to communicate the Company's quarterly earnings releases to investors and the public. At 1:33 p.m. on October 17, I sent the final version of IMS's 3Q earnings press release and the 8K Edgar filing to Business Wire via the Business Wire Connect online tool. It is my understanding that access to Business Wire Connect is password protected, and that I was the only person authorized to upload the information relating to IMS's 3Q earnings for fiscal year 2007 to Business Wire.

7. It is my understanding that at 2:01 p.m. on October 17, IMS sent the slides for IMS's 3Q earnings conference call with investors to Thomson Financial ("Thomson"). It is my understanding that Thomson received the slides and posted them

to a non-live URL, which is an internet address that is not yet connected to the World Wide Web. It is my understanding that this URL was not available to the public until activated and connected to the World Wide Web, when IMS's conference call began after the close of the stock market on October 17.

8. At 2:30 p.m., I received an e-mail notification from Business Wire that IMS's 3Q earnings press release was available for my review. It is my understanding that Business Wire took steps to maintain the confidentiality of this release until its public release after the close of the stock market. To access the release, I had to click on the link in the Business Wire e-mail and enter my password to Business Wire Connect.

9. At 2:37 p.m., I e-mailed the 3Q earnings press release to the IMS Finance team for their final approval. I used a secured and encrypted Virtual Private Network connection, which links remote users to the internal IMS network via the internet, to send the email. I also understand that IMS communicated the updated press release to IMS's Media team at 3:01 p.m. It is my understanding that the IMS Finance and Media teams took steps to maintain the confidentiality of this release until the release was provided to investors after the close of the stock market.

10. At 2:47 p.m., I received an email from Business Wire attaching IMS's Form 8-K filing, which included the 3Q earnings press release, for review.

11. At 3:55 p.m. I conducted a final review of the 3Q earnings press release by clicking on a link that Business Wire sent to me via e-mail and re-entering my password.

12. At 4:29 p.m., I notified Business Wire that IMS's 3Q earnings press release was approved and could be issued to investors.

13. At 4:33 p.m., IMS's 3Q earnings press release crossed the wire.

14. At 4:45 p.m., IMS sent its 3Q earnings press release via a blast e-mail to 1,496 investor contacts.

I declare under the penalty of perjury that the foregoing is true and correct.

Dated: November 8, 2007


Michael Fox